

First of all I would like to thank the FCC for allowing input prior to making decisions for the VRS industry.

WHITE LABELS Paragraph 45 -48:

I am a VI (CA as per FCC definition) that works for a "White-Label" company (CallVRS) that partners with CSDVRS. As part of subcontracting with this company, they required that I sign an agreement that I will not process any fraudulent calls or any type of calls that are not authorized by FCC. In addition, my contract stated that I must report any suspected fraudulent calls immediately to management and/or FCC. I have worked for several companies and this is the first time that it was required that I sign such a contract. I was extremely impressed with this requirement and also relieved. Since working with CallVRS, I can state without waiver that I have only processed organic calls and have not even had any call that were suspect to fraud. Requiring such a contract will ensure that fraudulent calls will be processed, in addition to protection for the "Whistle Blowers". If the Deaf community is aware that interpreters will report suspect calls, the greedy people who have abused this valuable service will be eliminated so we can get on with the business of providing organic calls that are conducted in the normal course of business, that would not be otherwise made. In addition, adding the requirement that all white label VRS providers must be disclosed both to FCC and the public will eliminate any unethical issues with regards to "White Labels". In addition, FCC should hold the licensed providers accountable so they will continue to ensure that abuses are eliminated. I fully support FCC in pursuing litigation against all abuses, including shutting down the company and full prosecution as allowed by law. I am a taxpayer as well and take exception to my hard earned tax dollars being wasted.

In another note, CallVRS only hires nationally certified interpreters with several years of interpreting experience which demonstrates that they are truly concerned about the quality of interpreting that is provided and not just in this to make money...as so many other VRS Providers appear to be doing by hiring unqualified interpreters in order to save money. I often hear complaints about VRS Providers employing unqualified interpreters from my Deaf family and friends. I have a large deaf family and feel that FCC should also require that interpreters be "Nationally Certified" to ensure the tax dollars are spent with the Deaf community needs as a priority, instead of "money making" as a priority. Many VRS Providers are now cutting their rates for interpreters which is a deterrent for obtaining "qualified interpreters" as these interpreters can earn more in their respective communities (what would be the benefit of working for VRS?). Requiring "Nationally Certified" interpreters will ensure that Deaf callers will receive at least the minimum qualifications required for VRS type work, as the type of calls have a vast range requires a large array of interpreting skills and experience. Many type of calls are crucial and can cause detrimental effects if not interpreted properly. An example of this is a patient calling his doctor...image what the effects would be if the patient was prescribed the wrong medication because the interpreter mis-interpreted the symptoms. I sincerely hope that FCC will consider this issue to ensure quality interpreting is maintained.

Small business commerce is a large part of the "American Dream" of which this country was established on...with competition being a positive element for consumers. VRS companies are starting up through subcontractor agreements with licensed VRS providers. Wiping out ?White Label? providers would close down the smaller companies and thereby creating a monopoly by the larger companies, which is what the larger VRS providers want to see happen. These "White Label" companies are not large corporate entities making multi-million dollars for the benefit of investors. They are trustworthy small businesses. Deaf consumers trust the quality and confidentiality of these service providers and the appeal is growing. Small VRS companies need an opportunity to grow while providing consumers with a choice in products and services.

WORKING FROM HOME

I have had the fortunate experience of working in a call center, as well as from home...as both a VI and in a management position. When working in a call center as a manager, I have had to re-iterate numerous times about confidentiality as VIs would want to talk about their individual calls immediately afterwards with their co-workers (other VIs). As a VI in a call center, there were many times when I would be on a call and I would hear comments or laughing about the call I was on. There have been times in which I have had VIs appear in my cubicle because they thought the call sounded interesting and they wanted to know who the caller was. This issue had to be addressed many times. I now work from home and do not have ANY of these confidentiality issues. My office door is kept locked while I am working alone. There is no one trying to listen in on my calls. In addition, management can record or view me in my call center (my video is on screen and they have the ability to do that), while on a call or not, to ensure no one is in the room with me at any time. Transfer calls can be processed with a click of a button. Management is available immediately either via a chat session or on the phone, should I run into a problem in which I need assistance. Our system complies with VRS requirements including the use of a backup device. We adhere to the same FCC requirements as call centers, and in some cases even better (as described above).

The benefit of working from home allows me to work hours that I cannot work at a local call center (the call centers are not open overnight in this area...the closest one being 2 hours away). In addition from the perspective of a Recruiting Manager (one of the positions I held at another company), it was difficult to find specialty skillsets in a local area (i.e. Spanish and ASL skills, Legal skills, Low Vision, etc.). Being able to recruit interpreters to meet these underserved Deaf populations requiring specialty skills is much easier to obtain with the option of hiring interpreters to work from home, than requiring traveling to a call center. Also, many interpreters working in remote locations can be recruited to work VRS that would otherwise not be possible.

Thank you for the opportunity to comment on these issues. After considering all the issues and

reviewing all the comments, I trust that FCC will make the best decision in regards to the VRS industry.